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20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO, et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' NOTICE OF  
DEPOSITION OF ERIN MOORE**

**NOTICE OF DEPOSITION**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Erin Moore on **March 11, 2025 at 4:00 p.m. PST** at 80 F Street, NW, Washington, DC 20001, as agreed upon by the parties. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Erin Moore by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial

1 DATED: March 6, 2025

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12 By: /s/ Danielle E. Leonard  
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1 **PROOF OF SERVICE**

2 I am employed in the City and County of San Francisco, California. I am over the age of  
3 eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300,  
4 San Francisco, California 94108. On March 6, 2025, I served the following document(s):

5 **PLAINTIFFS' NOTICE OF DEPOSITION OF ERIN MOORE**

6 on the parties, through their attorneys of record, as designated below:

7 **By Electronic Service:** By Email, I caused such document(s) to be served via electronic mail on the  
8 parties in this action by transmitting true and correct copies to the following email address(es):

9 KELSEY J. HELLAND  
10 Assistant United States Attorney  
450 Golden Gate Avenue, Box 36055  
11 San Francisco, California 94102-3495  
kelsey.helland@usdoj.gov

12 I declare under penalty of perjury under the laws of the State of California that the foregoing  
13 is true and correct. Executed March 6, 2025, at San Francisco, California.

14  
15 /s/ Giorgia Lingiardi  
Giorgia Lingiardi  
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## **EXHIBIT A**

Pursuant to 10 CFR 202.23(b), the Plaintiffs in the above-captioned action submit the following written statement concerning the above request for testimony, summarizing the desired testimony.

Requesting party are Plaintiffs American Federation of Government Employees, AFL-CIO, et al. The defendants named in the Amended Complaint are the United States Office of Personnel Management (“OPM”) and its Acting Director, Charles Ezell. The Defendants named in the Second Amended Complaint include 23 federal agencies and their heads, including the Department of Energy and Energy Secretary Chris Wright.

The subject matter of this litigation is the unlawful terminations of federal probationary employees across the federal government. Plaintiffs are informed and believe that Erin Moore possesses knowledge of the events related to terminations of probationary employees by the Department of Energy that commenced on or about February 13, 2025, including but not limited to direction by the Office of Personnel Management (OPM) with respect to the termination of probationary employees to the federal agencies including the Department of the Energy implementation of that direction and desire testimony concerning that direction.

Counsel for OPM, represented by the U.S. Attorneys’ Office for the Northern District of California and the U.S. Department of Justice, Civil Division, Federal Programs have been aware of the scope of Plaintiffs’ requested relief, which encompasses actions taken by the Department of Commerce and its sub-agencies, since the case was initially filed on February 19, 2025. Counsel for OPM have also been aware of Plaintiffs’ intention to add agency defendants including the Department of Energy to the case since February 27, 2025.